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December 5, 2019

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Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *People of the State of New York v. Pennsylvania Higher Education Assistance Agency
d/b/a FedLoan Servicing and American Education Services, 19-cv-9155*

Dear Judge Ramos:

We write on behalf of defendant Pennsylvania Higher Education Assistance Agency ("PHEAA") to request an adjournment of the pre-motion conference scheduled for December 18, 2019 at 10:30 a.m. (Dkt. No. 16.) I will be out of town on December 18, as will my partner John Grugan, who is lead counsel for PHEAA in this matter. (Mr. Grugan's *pro hac vice* application is *sub judice*). This is PHEAA's first request for an adjournment of the pre-motion conference. Counsel for the People of the State of New York do not oppose PHEAA's request for an adjournment.

Counsel for both parties are available on December 19 or December 23, 2019 for the pre-motion conference if the Court has availability on either date. We are of course available to answer any questions Your Honor may have.

Respectfully submitted,

/s/ Marjorie J. Pearce

Marjorie J. Pearce

MJP/mm

cc: Jane M. Azia, Esq. (by ECF)
Carolyn M. Fast, Esq. (by ECF)
Sarah E. Trombley, Esq. (by ECF)